

EXHIBIT “A”

SUMMONS AND COMPLAINT

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF CHARLESTON)	C.A. No:
ALTON OWN,)	
)	
Plaintiff,)	
)	
vs.)	SUMMONS
)	(JURY TRIAL REQUESTED)
THE BOEING COMPANY,)	
)	
Defendant.)	
)	

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action a copy of which is hereby served upon you, and to serve a copy of your Answer to the Complaint on the subscriber at his office at 4000 Faber Place Drive, Suite 300, North Charleston, SC 29405 within thirty (30) days after the service thereof, exclusive of the day of service. If you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you.

ELECTRONICALLY FILED - 2021 Oct 05 3:45 PM - CHARLESTON - COMMON PLEAS - CASE#2021CP1004611

Respectfully Submitted,

s/Bonnie Travaglio Hunt

Bonnie Travaglio Hunt

Hunt Law LLC

Federal Bar # 07760

SC Bar # 12341

Attorney for the Plaintiff

4000 Faber Place Drive, Suite 300, N. Charleston, 29405

Post Office Box 1845, Goose Creek, SC 29445

(843)553-8709

Facsimile (843)492-5509

bthunt@huntlawllc.com

s/Peter Kaufman

Peter Kaufman

Kaufman Labor & Employment Solutions, LLC

SC Bar #100144

295 Seven Farms Dr. Ste C-267

Charleston, SC 29492

(843)513-6062

pkaufmanlaw@gmail.com

October 5, 2021

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF CHARLESTON)	C.A. No:
ALTON OWEN,)	
)	
Plaintiff,)	
)	
vs.)	COMPLAINT
)	(JURY TRIAL REQUESTED)
THE BOEING COMPANY,)	
)	
Defendant.)	
)	

The Plaintiff, Alton Owen, by and through his undersigned attorneys Bonnie Travaglio Hunt of Hunt Law LLC and Peter M. Kaufman of Kaufman Labor Employment Solutions, LLC, does hereby make the following claims and allegations:

PARTIES AND JURISDICTION

1. The Plaintiff is a resident of Charleston County, South Carolina.
2. The Defendant, The Boeing Company (hereinafter referred to as Defendant) is a foreign corporation, which does business in, contracts in, and derives benefit from the laws of the State of South Carolina.
3. The Plaintiff, Alton Owen, (hereinafter referred to as the Plaintiff) is a resident of the State of South Carolina.
4. All parties and events herein mentioned are within the jurisdiction of this Honorable Court.
5. This Court has jurisdiction over the parties and subject matter and venue is proper.

FACTS

6. That the Plaintiff was hired by the Defendant as an FRT (Flight Readiness Technician).
7. The Plaintiff was one of the first FRT's (Flight Readiness Technician) hired at the Charleston Facility. When the Plaintiff was hired the Final Assembly Building was not yet built at the Charleston Facility and the Flight Line was dirt.
8. That during the Plaintiff's employment the Plaintiff as promoted to Frist Level or K Level Manager on the Flight Line in Stall A1. The Plaintiff oversaw FRT employees, Kurt Hollensteiner, Jason Jones, Brad Millhouse, Alan Sharkshnas, Ben Williamson, and Joshua Rogers on Second Shift.
9. That the Plaintiff later moved to first shift where he spent time with Joseph Delmarco, Richard Mester, Joseph Clayton, Tim Raper, Tim Hayden, Eric Denecke, William Conner, and John "Mitch" Jones.
10. That the Plaintiff did not receive any paperwork from the Defendant regarding his termination. That the Plaintiff was informed that he was terminated for falsification of records.
11. That the Plaintiff had never been disciplined during his employment.
12. That the Plaintiff was terminated on October 11, 2018. At the time of his termination, he was a Level K manager.
13. That when the Plaintiff was terminated there was another African American employee who allegedly committed the same acts as the Plaintiff and was not terminated.
14. That the Plaintiff and the African America were similarly situated in position, and discipline.

15. That the Plaintiff was treated differently than the African American employee based on his race-White.
16. That the Defendant Boeing violated 42 U.S.C. 1981 when it terminated the Plaintiff for actions that it did not terminate the African American employee for.
17. That the Plaintiff was informed during his termination that he was terminated for falsification of records.
18. That after the Plaintiff's termination, an African American Employee who did the same exact actions of the Plaintiff was not terminated from his employment.
19. That as a direct and proximate cause of the Defendant's wrongful termination of the Plaintiff, the Plaintiff:
 - a. Suffered the loss of his job;
 - b. Suffered lost wages, the loss of his salary; and future increases thereof;
 - c. Suffered the loss of benefits associated with his job;
 - d. Suffered the loss of future benefits associated with his job;
 - e. Suffered consequential economic damages as a result of the loss of his job;
 - f. Incurred attorney's fees and costs as a result of having to bring this action.
32. That the Plaintiff is entitled to an award of damages against the Defendant for actual damages, consequential damages, punitive damages, attorney's fees, costs of this action and other damages, such as this Honorable Court deems appropriate and just.

PRAYER FOR DAMAGES

WHEREFORE, the Plaintiff prays for an award of damages against the Defendant in the amount of:

- A. Actual damages;
- B. Consequential damages;
- C. Compensatory
- D. Punitive damages;

- E. All other damages under South Carolina Law;
- F. Other damages such as this Honorable Court deems appropriate and just.

Respectfully Submitted,

s/Bonnie Travaglio Hunt

Bonnie Travaglio Hunt

Hunt Law LLC

Federal Bar # 07760

SC Bar # 12341

Attorney for the Plaintiff

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s/Peter Kaufman

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HUNT LAW LLC

Bonnie Travaglio Hunt Attorney At Law

November 9, 2021

Corporation Service Co.
508 Meeting Street
West Columbia, SC 29169

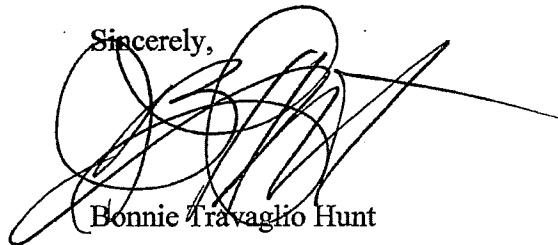
Re: *Alton Owen v. The Boeing Company*
2021-cp-10-04611

Dear Sir/Madam:

Please find enclosed the Summons and Complaint in the above referenced action hereby served upon you as the listed registered agent for *The Boeing Company* in accordance with the South Carolina Rules of Civil Procedure. The Secretary of State's office for the State of South Carolina has you listed as the registered agent, if this is in error please notify my office immediately at (843)553-8709.

If you are the proper agent please immediately refer this to your attorney.

Sincerely,

A handwritten signature in black ink, appearing to be 'Bonnie Travaglio Hunt', written over a horizontal line.

cc: William Floyd
Mary Stuart King
NEXSEN PRUET, LLC
Post Office Box 486
Charleston SC 29402

South Carolina Secretary of State

Business Entities Online

File, Search, and Retrieve Documents Electronically

BOEING COMPANY THE**Corporate Information**

Entity Type: Corporation

Status: Good Standing

Domestic/Foreign: Foreign

Incorporated State: Delaware

Important Dates

Effective Date: 10/20/1999

Expiration Date: N/A

Term End Date: N/A

Dissolved Date: N/A

Registered Agent

Agent: CORPORATION SERVICE CO

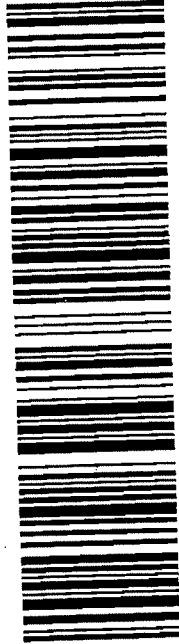
Address: 508 Meeting Street
West Columbia, South Carolina 29169**Official Documents On File**

Filing Type	Filing Date
Notice of Change of Registered Office or Registered Agent or Both of a Foreign Corporation	08/22/2020
Articles of Merger	01/17/2017
Merger/Share Exchange	04/10/2012
Merger/Share Exchange	02/22/2011
Merger/Share Exchange	02/22/2011
Merger/Share Exchange	01/29/2010
Change of Agent or Office	12/06/2007
Change of Agent or Office	09/03/2002
Authority	10/20/1999

HUNT LAW LLC
P.O. Box 1845
Goose Creek, SC 29445

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